

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

TAMMY BABBITT and WILLIAM  
CARTER, individually and on behalf of  
other similarly situated individuals,

Plaintiffs,

v.

TARGET CORPORATION,

Defendant.

Case No. 20-cv-00490-DWF-ECW

**DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT  
REGARDING PLAINTIFF TAMMY  
BABBITT**

Defendant Target Corporation hereby moves the Court, pursuant to Rule 56 of the Federal Rules of Civil Procedure, for an order granting its motion for summary judgment dismissing Plaintiff Tammy Babbitt's claims against Defendant as a matter of law. This motion is based upon the accompanying Memorandum of Law, Declaration of Michael Brewer, Declaration of David A. James, and the record previously filed with the Court.

NILAN JOHNSON LEWIS PA

Dated: August 6, 2021

By: s/ Joseph G. Schmitt

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